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12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Aaron Feld,

16 Plaintiff,

17 v.

18 Navient Solutions LLC and
19 Pioneer Credit Recovery, Inc.,

20 Defendants.

Case No.: 2:20-cv-01156-GMN-NJK

**Stipulation and Order for an
extension of time for the Parties to
respond to their respective motions
for summary judgment**

21 Aaron Feld ("Plaintiff"), Navient Solutions LLC, and Pioneer Credit
22 Recovery, Inc. ("Defendants") (together as "the Parties") by counsel, hereby
23 submit this Stipulation and Order for an extension of time for the Parties to
24 respond to their respective motions for summary judgment. Both motions were
25 filed on January 12, 2022, this is the second request for an extension of this
26 deadline.
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1 The extension is sought because, although the March 24, 2022 Settlement
 2 Conference with Judge Koppe was unsuccessful, the parties have since
 3 reengaged in settlement discussions. The parties hope to avoid the additional
 4 expense of briefing their respective motions, as without this added cost, may
 5 put the parties in a better position to reach a resolution.

6 As such, the parties are requesting an extension of time to file their
 7 respective oppositions to the motions for summary judgment by 30 days from
 8 the current deadline of April 14, 2022 to **May 14, 2022**, with the reply deadline
 9 moved from April 21, 2022 to **May 21, 2022**.

10 This Stipulation is brought in good faith and not for purposes of delay.
 11 The parties hereby request that the Court order that the Parties' oppositions to
 12 the pending motions for summary judgment shall be due on or before **May 14,**
 13 **2022**, with the reply due on or before May 21, 2022.

14 Dated: April 7, 2022.

15 **FREEDOM LAW FIRM, LLC**

16 /s/ Gerardo Avalos

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20 **SPENCER FANE LLP**

21 /s/ Jessica Chong

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Counsel for Defendants

IT IS SO ORDERED.

Dated this 7 day of April, 2022.


 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT